

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

GEORGE HEDICK JR., Individually and on behalf of
himself and all others similarly situated,

Plaintiff,

v.

THE KRAFT HEINZ COMPANY, BERNARDO
HEES, PAULO BASILIO, and DAVID H. KNOFF,

Defendants.

Case No. 1:19-cv-01339

The Honorable Robert M. Dow, Jr.

**STIPULATION AND ORDER EXTENDING
TIME TO FILE THE CONSOLIDATED CLASS ACTION COMPLAINT AND
SETTING SUBSEQUENT BRIEFING DEADLINES**

WHEREAS, on April 18, 2019, the Court entered a stipulation submitted by Plaintiff George Hedick, Jr. (“Hedick”), Defendants The Kraft Heinz Company, Bernardo Hees, Paulo Basilio, and David Knopf (collectively, “Defendants”) (the “Stipulation”) [ECF No. 38];

WHEREAS, the Stipulation contemplated a schedule where lead plaintiff shall have 60 days after the entry of an order appointing lead plaintiff pursuant to the Private Securities Litigation Reform Act, 15 U.S.C. § 78u-4 et seq. to serve and file a consolidated class action complaint; Defendants shall have 60 days from the filing of a consolidated class action complaint to move or plead in response to the operative complaint; lead plaintiff shall have 60 days from the date that Defendants file such motion to file an opposition brief; and Defendants shall have 45 days from the date that lead plaintiff files the opposition brief to file a reply brief;

WHEREAS, the Court appointed Sjunde AP-Fonden and Union Asset Management Holding AG as Lead Plaintiffs and approved the selection of Kessler Topaz Melter & Check, LLP and Bernstein Litowitz Berger & Grossmann LLP as co-lead counsel on October 8, 2019 [ECF No. 58];

WHEREAS, pursuant to the Stipulation, Lead Plaintiffs' Consolidated Class Action Complaint (the "Complaint") is due on or before December 6, 2019;

WHEREAS, there have been no requests for an extension of time previously made in this matter;

WHEREAS, due to scheduling conflicts, Lead Plaintiffs request a brief extension of time to file the Complaint;

WHEREAS, Lead Plaintiffs have conferred with Defendants and Defendants do not object to the requested extension of time;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and among the parties through their respective counsel of record as follows:

1. Lead Plaintiffs shall file the Complaint on or before Monday, January 6, 2020.
2. Defendants shall have 60 days from the date the Complaint is filed to move to dismiss or file their answer to the Complaint.
3. Lead Plaintiffs shall have 60 days to file an opposition if Defendants move to dismiss the Complaint.
4. Defendants shall have 45 days from the date that Lead Plaintiffs file the opposition brief to file a reply brief.

Dated: November 26, 2019

/s/ Salvatore J. Graziano

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/s/Sandra C. Goldstein

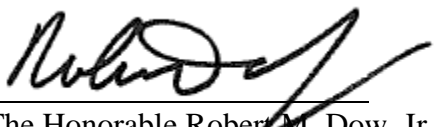
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Counsel for Defendant 3G Capital, Inc.

SO ORDERED: 12/2/2019


The Honorable Robert M. Dow, Jr.
United States District Judge